

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Jo Ann Fanzone aka Judy McGrath
Plaintiff

CIVIL ACTION
No. 12-5926

v.

Joe Oteri, et al
Defendants

Plaintiff's CAUSE OF THIS PERSONAL INJURY ACTION
SHALL NOT BE UNJUSTLY DISMISSED

- Plaintiff, by and through her attorney, Jo Ann Fanzone, Esquire (disabled by incidents on Oct. 6, 2010 subject of this action), hereby affus the following in support of her contention:
1. Plaintiff was a crime victim of two incidents of aggravated assault, one at 5:45 p.m. by Joe Oteri, and later by Officer Kelenzki at 6:15 and has evidence of these facts.
 2. Plaintiff suffered serious trauma to her head, neck, chest, right shoulder, arm, hand and wrist during the incidents at the stadium seat at 5:45 and then later at 6:15 and has a police recording of the latter when she phoned 911 for help as she was in fear for her life and was a grown against the wall by Kelenzki after being hit twice. The second time occurred because the first time Plaintiff phoned 911 for help; he believed she knew Plaintiff's home.
 3. Plaintiff has a severe headache, medical treatment (began in Emergency Room in Philadelphia) and are continuing with neurologists for concussion, seizure, chronic migraines, tinnitus, fibromyalgia, and went deaf in her right ear from the head trauma in 2019. Plaintiff went deaf in her right ear from the head trauma.

- C From the neck trauma Plaintiff has suffered Plaintiff suffered many disk herniations, had surgery continues to experience pain and now has heightened pain in the thoracic area of her spine, scheduled for MRI prior to her appointment with orthopedic on 3/31/22.
- D From the chest trauma Plaintiff continues to treat with cardiologists (was hospitalized many times since 2010) for cardiac conditions caused by the defendants striking her chest repeatedly because she called 911 for help.
- E From trauma to her right side, Plaintiff has weakness to her right hand, suffered wrist fracture and has chronic pain to her right shoulder and right upper back fibromyalgia.
- Plaintiff has suffered loss of enjoyment of life, damage to her career and many other damages as a result of being a victim who did nothing wrong except go to a Major League baseball playoff game.
- WHEREFORE, Plaintiff's injury case must not be dismissed to the interests of JUSTICE, I am in the Clerk's office in Allentown, PA writing this because I just now was given a copy of the Order of 3/10/21 by Evelyn. (I DID NOT previously have these orders with a 7 day later) Respectfully submitted,
- Jonathan Farzane, Esquire
aka Judy McGrath
Plaintiff, witness, victim

631 Primrose Lane
Allentown, PA 18104

2:25 pm